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## EXHIBIT O

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UNITED STATES DISTRICT COURT  
DISTRICT OF GUAM

NANYA TECHNOLOGY CORP. and  
NANYA TECHNOLOGY CORP. U.S.A.,

*Plaintiffs,*

v.

FUJITSU LIMITED and FUJITSU  
MICROELECTRONICS AMERICA, INC.,

*Defendants.*

Case No. CV-06-00025

**DECLARATION OF  
ANDREW HUFFSTETLER**

I, Andrew Huffstetler, hereby declare as follows:

1. My name is Andrew Huffstetler. I am over the age of 21 and am competent to make this declaration. All of the statements set forth herein are true and correct and are based on my professional practice and personal knowledge.

2. I am the Multimedia and Litigation Support Specialist for Shore Chan Bragalone LLP. As part of my job responsibilities, I oversee certain reverse engineering and device disassembly projects.

3. On June 21, 2007, I received Toyota Part No. 83291-47230, the instrument cluster computer from a Toyota Prius automobile (hereinafter referred to as the "Prius Computer "). The Prius Computer was shipped from DCH Brunswick Toyota/Scion. A true and correct copy of the shipping invoice is attached hereto as Exhibit A. A true and correct copy of the credit card receipt is attached hereto as Exhibit B.

4. Soon after receipt, I took photographs of the Prius Computer in its as-received state. True and correct copies of these photographs are attached hereto as pages 1-4 of Exhibit C.

1           5.     After taking the as-received photographs, I cut the top edge support structure of  
2 the Prius Computer's display with a Dremel tool and pulled the display away from the circuit  
3 board. True and correct copies of photographs depicting this are attached hereto as pages 5-10 of  
4 Exhibit C.

5  
6           6.     After cutting and pulling away the display, I inspected the circuitry revealed  
7 underneath and found a microchip device bearing the part number "MB90583C-148." A true and  
8 correct copy of a close-up photograph of the MB90583C device is attached hereto as page 11 of  
9 Exhibit C.

10           7.     I researched Fujitsu Ltd.'s website ([www.fujitsu.com](http://www.fujitsu.com)) and found a publicly-  
11 available document titled "F<sup>2</sup>MC™-16LX 16-BIT MICROCONTROLLER MB90580C Series  
12 Hardware Manual." True and correct copies of two particular pages from this document are  
13 attached hereto as Exhibit D. Page 5 of this document (*i.e.*, the second page of Exhibit D)  
14 confirms that the MB90583C device found in the Prius Computer is a member of Fujitsu's  
15 MB90580C Series of 16-bit microcontrollers.

16  
17           8.     I researched Fujitsu Ltd.'s website ([www.fujitsu.com](http://www.fujitsu.com)) and found a publicly-  
18 available document titled "16-bit Proprietary Microcontroller CMOS F<sup>2</sup>MC-16LX MB90580C  
19 Series MB90583C/583CA/F583C/F583CA/587C/587CA/V580B." A true and correct copy of  
20 the front page of this document is attached hereto as Exhibit E. The front page confirms lists the  
21 MB90583C device found in the Prius Computer is a member of Fujitsu's MB90580C Series of  
22 16-bit microcontrollers.

23  
24           9.     On June 21, 2007, I received a Nintendo DS Lite, which was shipped from Guam  
25 by attorney Joseph Razzano and hand delivered to me by attorney Alfonso Garcia Chan. It is my  
26 understanding that the Nintendo DS Lite was purchased from Toys N' Joys in Guam.  
27  
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1           10.     Soon after receipt, I took a photograph of the Nintendo DS Lite in its as-received  
2 state. A true and correct copy of this photograph is attached hereto as page 1 of Exhibit F.

3           11.     After taking the as-received photographs, I unattached the Nintendo DS Lite's  
4 casing and game cartridge receiver and exposed the circuit board. True and correct copies of  
5 photographs depicting this are attached hereto as pages 2-3 of Exhibit F.

6           12.     After exposing the circuit board, I inspected the revealed circuitry and found a  
7 microchip bearing a stylized "F" mark and the part number "82DBS02163C-70L." A true and  
8 correct copy of a close-up photograph of the 82DBS02163C-70L device is attached hereto as  
9 page 4 of Exhibit F.

10           13.     I researched Fujitsu Ltd.'s website ([www.fujitsu.com](http://www.fujitsu.com)) and found a document titled  
11 "MEMORY Mobile FCRAM™ CMOS 32M Bit (2 M word X 16 bit) Mobile Phone Application  
12 Specific Memory MB82DBS02163C-70L." A true and correct copy of the front page of this  
13 document is attached hereto as Exhibit G. The 82DBS02163C-70L device's numbering exactly  
14 matches Fujitsu part no. MB82DBS02163C-70L's numbering after the "MB" prefix. This and  
15 the front page confirms that the 82DBS02163C-70L found in the Nintendo DS Lite is the same  
16 Fujitsu MB82DBS02163C-70L device described in Exhibit G.

17           14.     On June 21, 2007, I received a Sony PlayStation Portable (hereinafter referred to  
18 as "Sony PSP"). The Sony PSP was shipped from Guam by attorney Joseph Razzano and hand  
19 delivered to me by attorney Alfonso Garcia Chan. It is my understanding that the Sony PSP was  
20 purchased from Toys N' Joys in Guam.

21           15.     Soon after receipt, I took photographs of the Sony PSP in its as-received state.  
22 True and correct copies of these photographs are attached hereto as page 1-2 of Exhibit H.

1           16.     After taking the as-received photographs, I unattached the Sony PSP's casing and  
2     disassembled the device to expose its circuit board. True and correct copies of photographs  
3     depicting this are attached hereto as pages 3-4 of Exhibit H.

4           17.     After exposing the circuit board, I inspected the revealed circuitry and found a  
5     microchip bearing a stylized "F" mark and the part number "MB44C012." True and correct  
6     copies of close-up photographs of the MB44C012 device are attached hereto as pages 5-6 of  
7     Exhibit H. Based on my review of the Fujitsu Ltd.'s website ([www.fujitsu.com](http://www.fujitsu.com)) and Fujitsu's  
8     product marking and numbering scheme, the MB44C012 device has both the stylized "F" mark  
9     and the "MB" prefix characteristic of Fujitsu semiconductor devices.

10           I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE  
11     UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

12     SIGNED ON THE 22 DAY OF JUNE, 2007

13           SIGNATURE



14           PRINTED NAME

15     Andrew Huffstetler

# **EXHIBIT A**

# DCH Brunswick Toyota/SCION

1504 ROUTE 1, NORTH BRUNSWICK, NEW JERSEY 08902 TEL: (732) 418-7888 FAX: (732) 418-1361 www.dchbrunswicktoyota.com

## NO CASH REFUNDS

ALL CLAIMS AND RETURNED GOODS MUST BE ACCOMPANIED BY THIS INVOICE.  
NO RETURNS ON ELECTRICAL OR SPECIAL ORDER PARTS.  
NO RETURNS AFTER 30 DAYS. 10% RE-STOCK CHARGE ON ALL RETURNED PARTS.

## DISCLAIMER OF WARRANTIES

Any warranties on the product sold hereby are those made by the manufacturer. The seller hereby expressly disclaims all warranties, either express or implied, including any implied warranty of merchantability or fitness for a particular purpose, and the seller neither assumes nor authorizes any other person to assume for it any liability in connection with the sale of said products.

DATE ENTERED	YOUR ORDER NO.	DATE SHIPPED	INVOICE DATE	INVOICE NUMBER
20 JUN 07		20 JUN 07	20 JUN 07	234598

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ACCOUNT NO. 2145929111

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PAGE 1 OF 1

SHORE CHAN  
DWORK, STUART  
325 NORTH ST PAUL AVE  
DALLAS, TX 75201

SHIP VIA		SLSM	B/L NO.	TERMS		F.O.B. POINT	
		GW		RETAIL CASH		NORTH BRUNSWICK	
QTY	QTY	QTY	PART NO.	DESCRIPTION	LIST	NET	AMOUNT
1	1	0	83291-47230	140F COMPUTER	482.13	482.13	482.13
1	1	0	FREIGHT	SPO SHIPPED	43.60	43.60	43.60
THANK YOU FOR YOUR PURCHASE AT BRUNSWICK TOYOTA YOUR SATISFACTION IS OUR MISSION. WHOLESALE HOT LINE 1-800-368-0097 FAX 732-418-1361							
CUSTOMER'S SIGNATURE				PARTS		525.73	
X				SUBLET			
				FREIGHT		0.00	
				SALES TAX		36.80	
				TOTAL		\$562.53	

*Thank You  
for your  
Business!*

# **EXHIBIT B**

BRUNSWICK TOTAL  
1504 US RT 1  
NO BRUNSWICK, NJ. 08902-  
732-867-5185

Phone/Web

ID: 001054851000000022183  
06/26/07  
AVS Code:

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CV2 Code: U

Appr Code: 251144

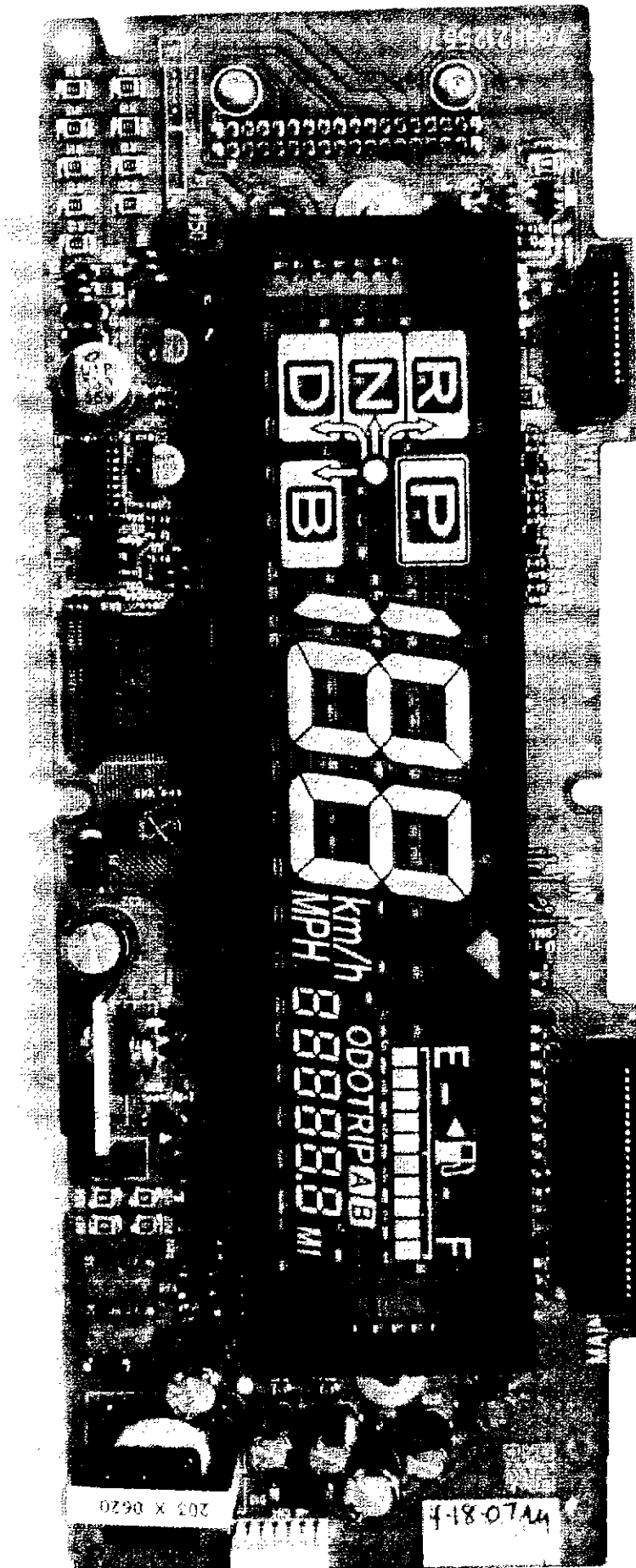
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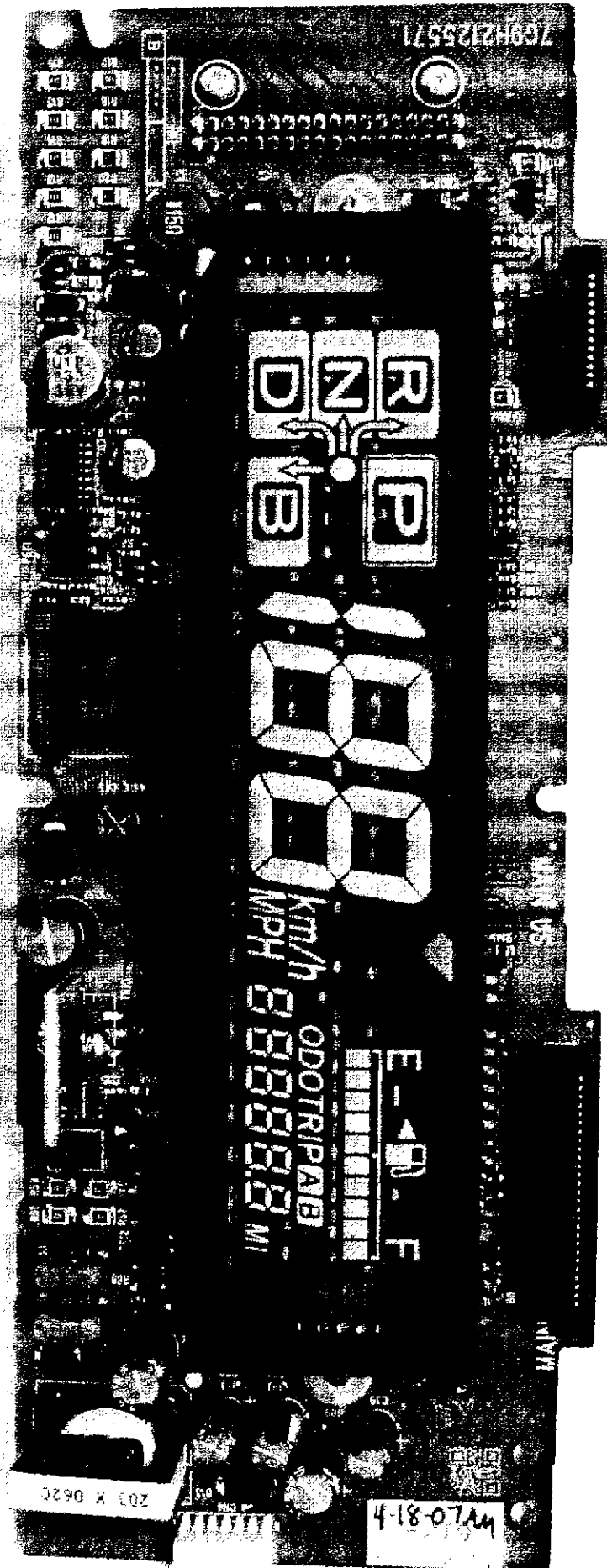
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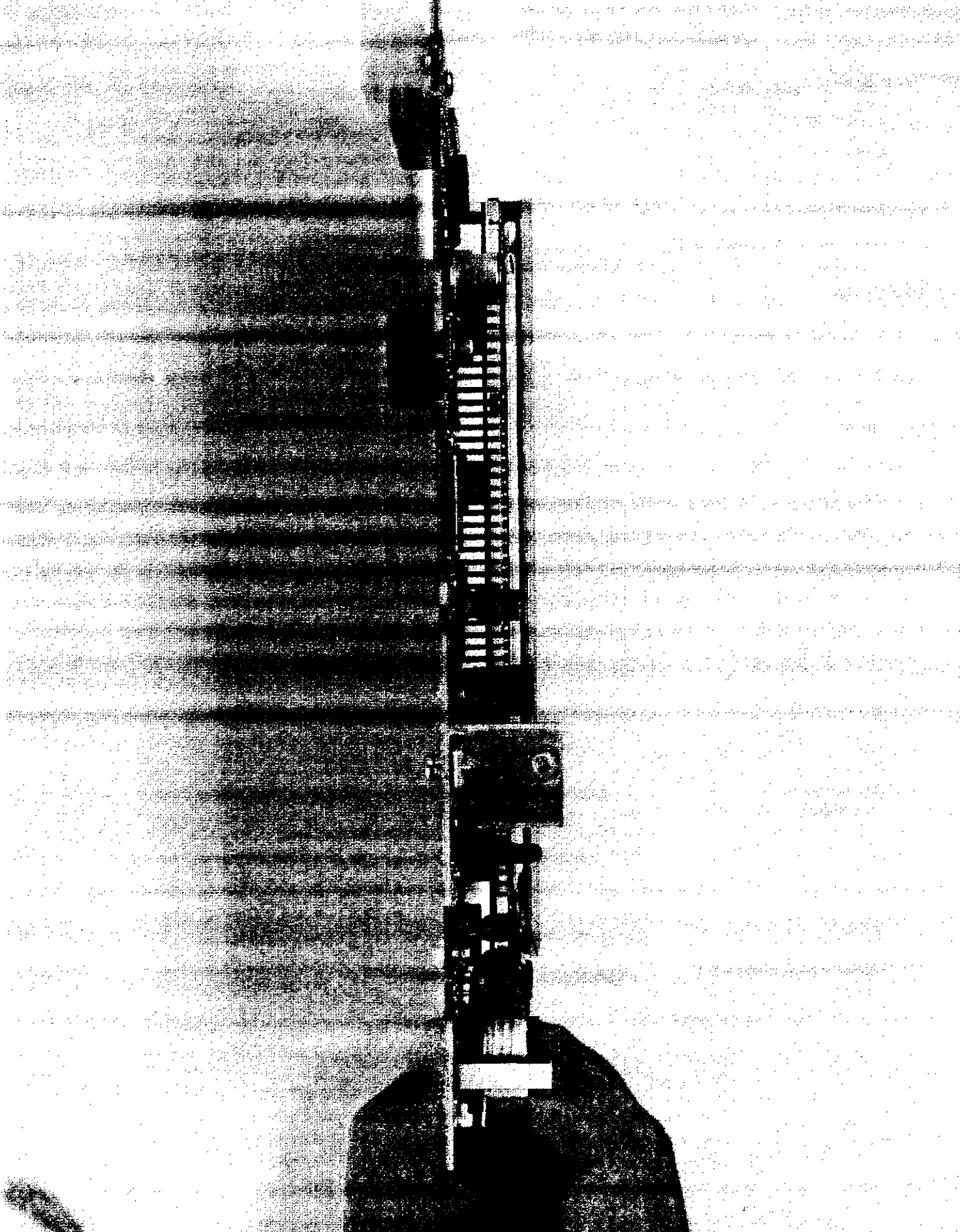
\$ 562.53

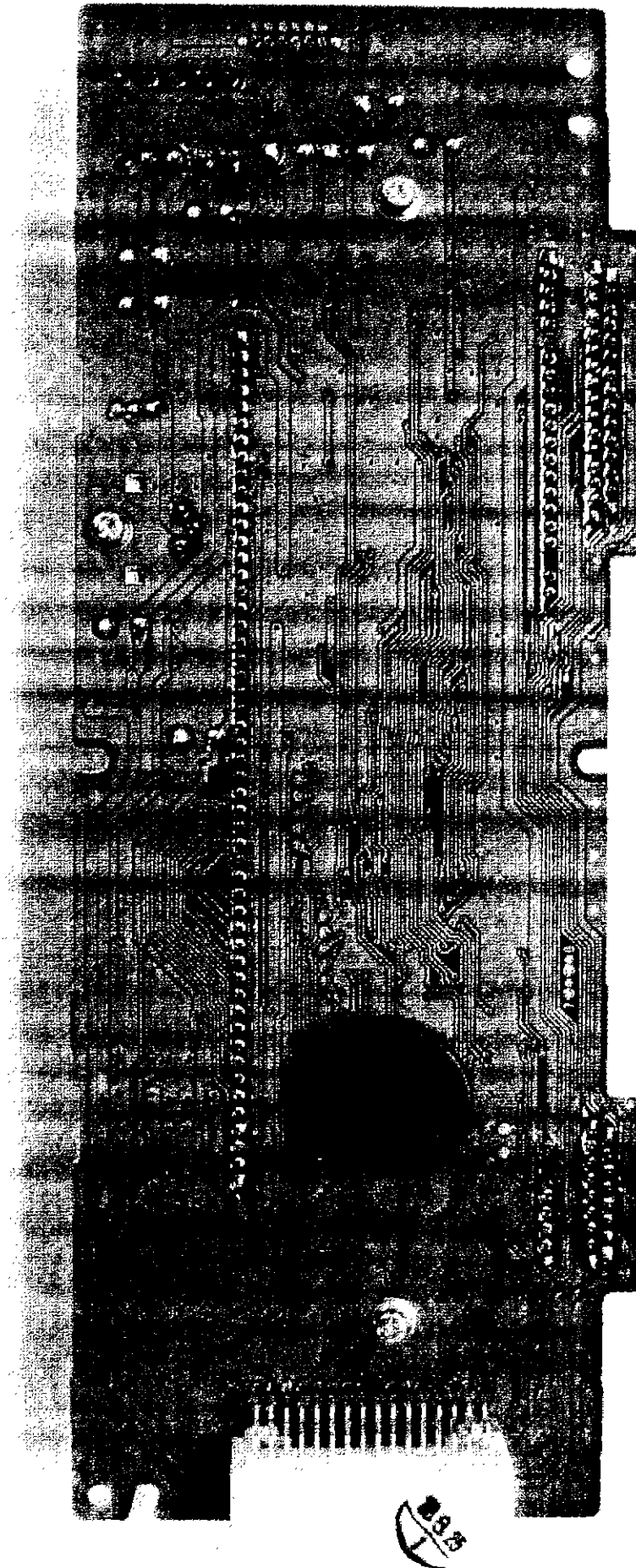
Customer Copy  
THANK YOU!

# **EXHIBIT C**

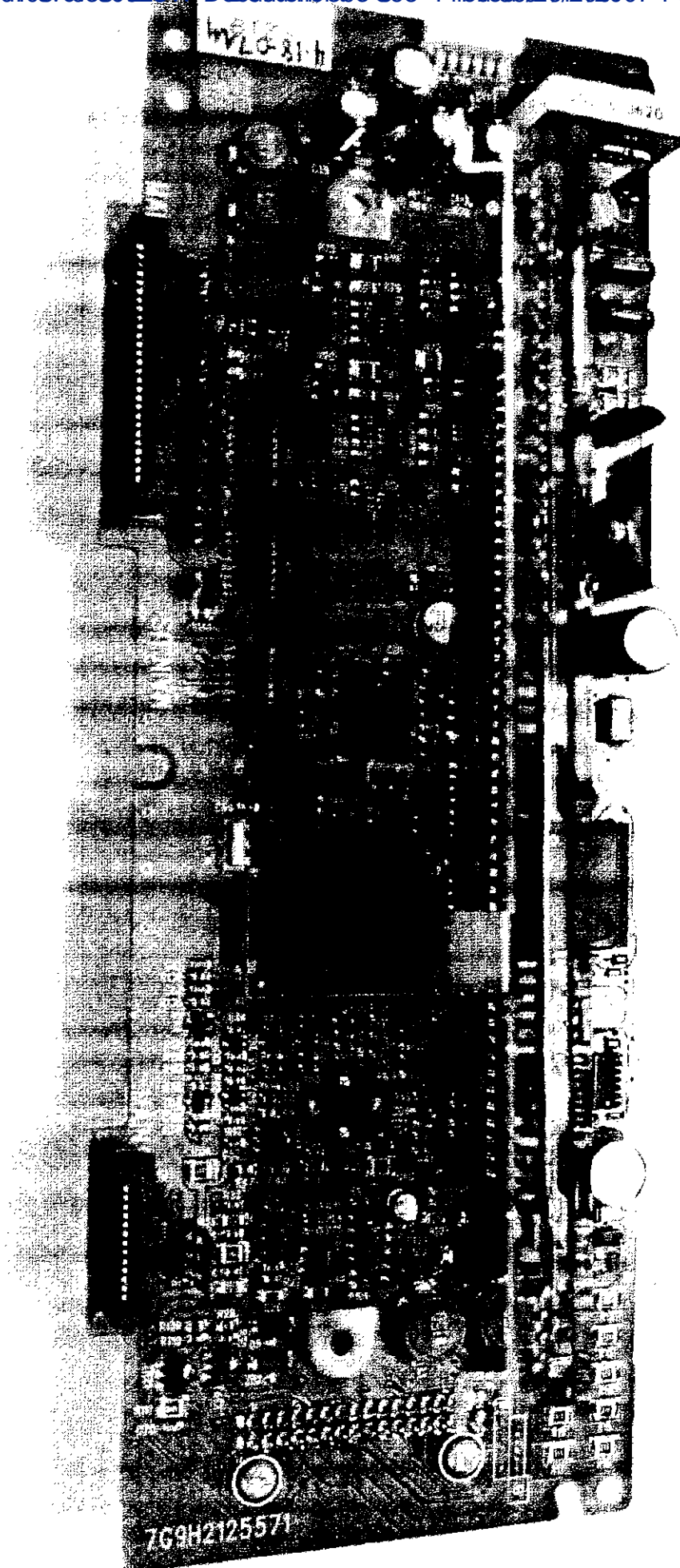


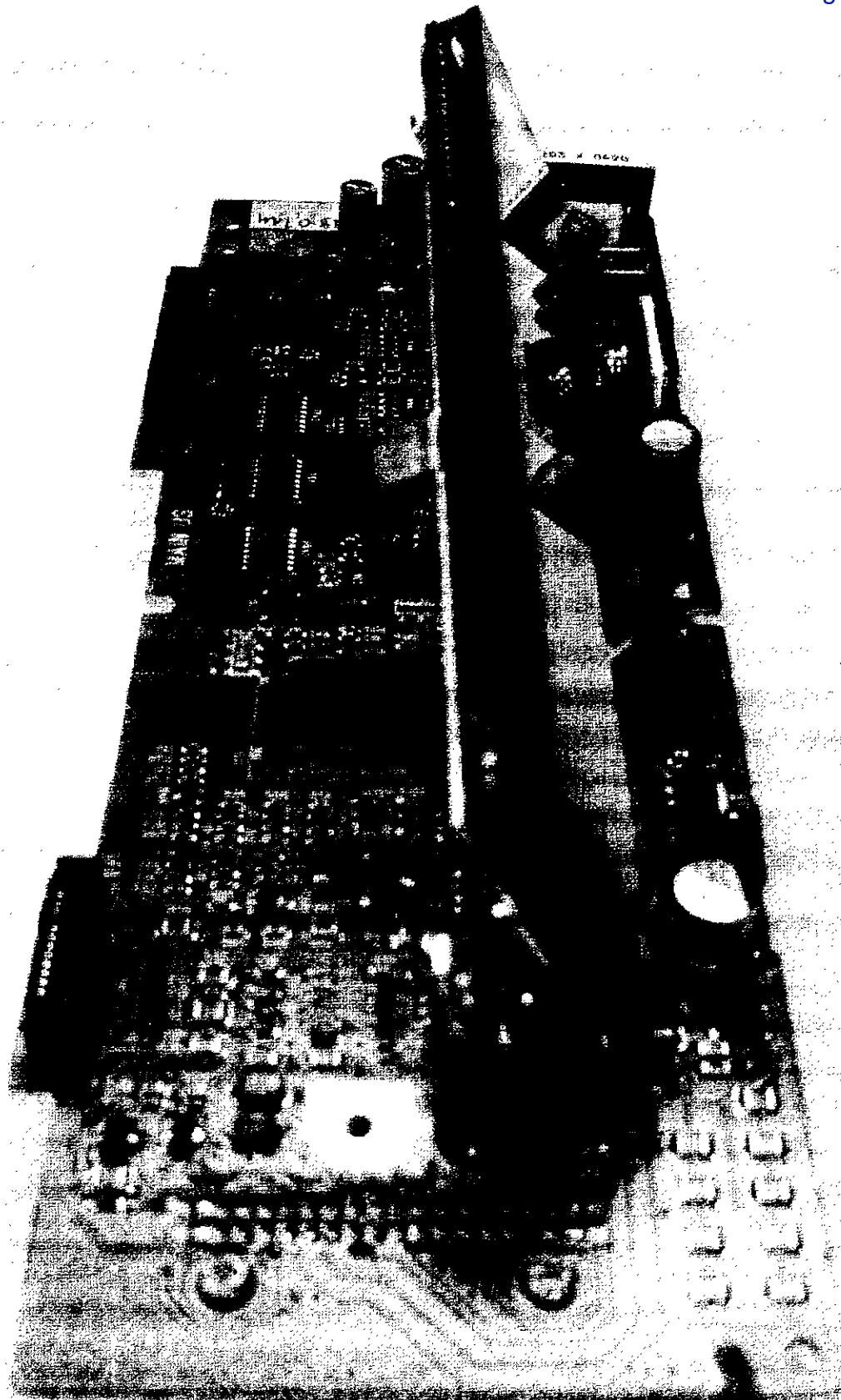


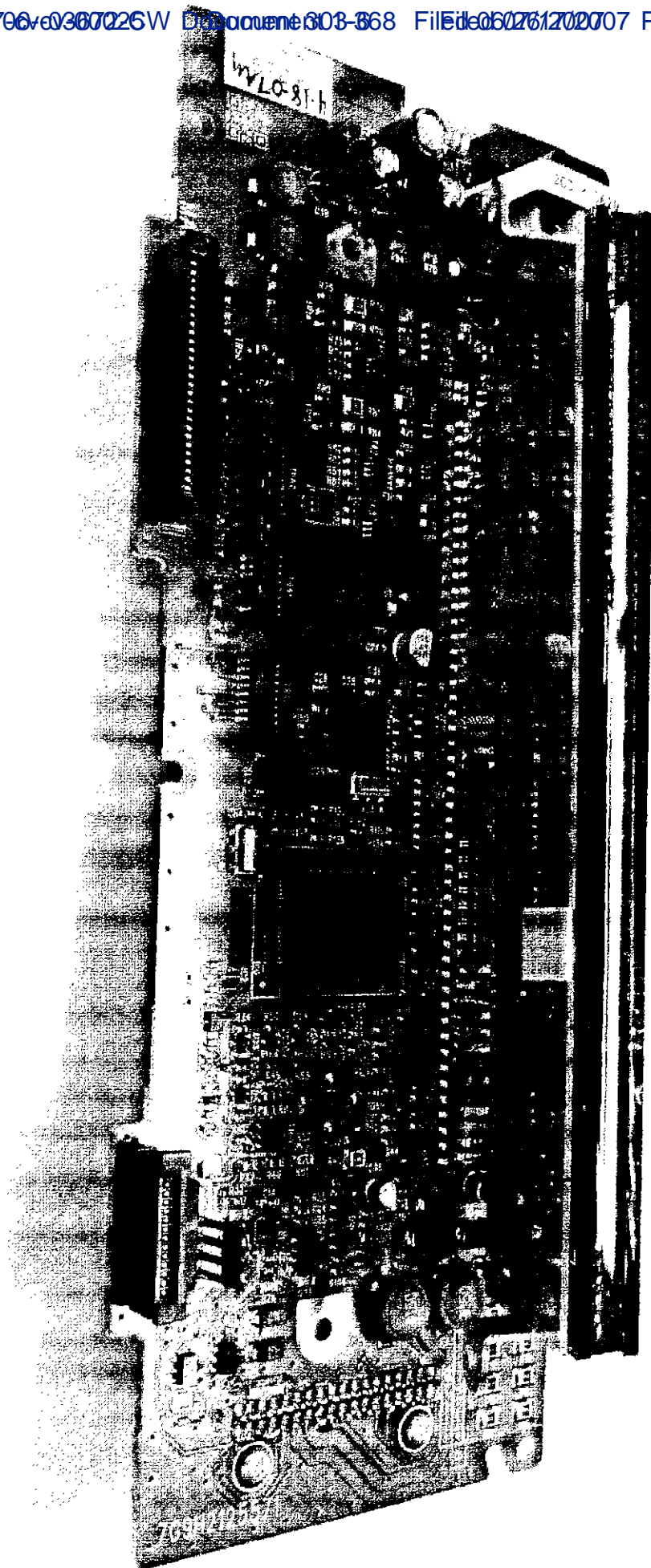


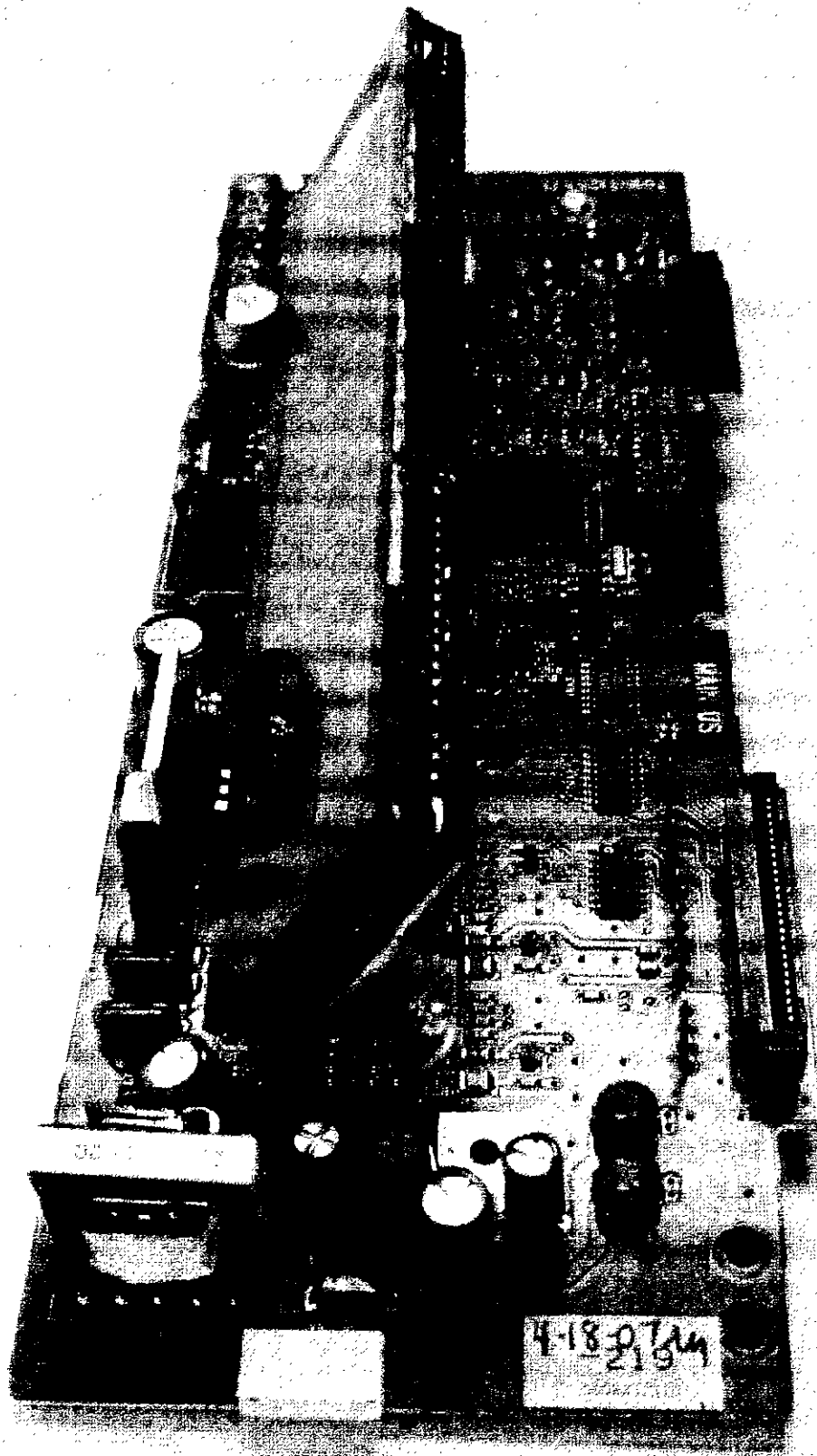


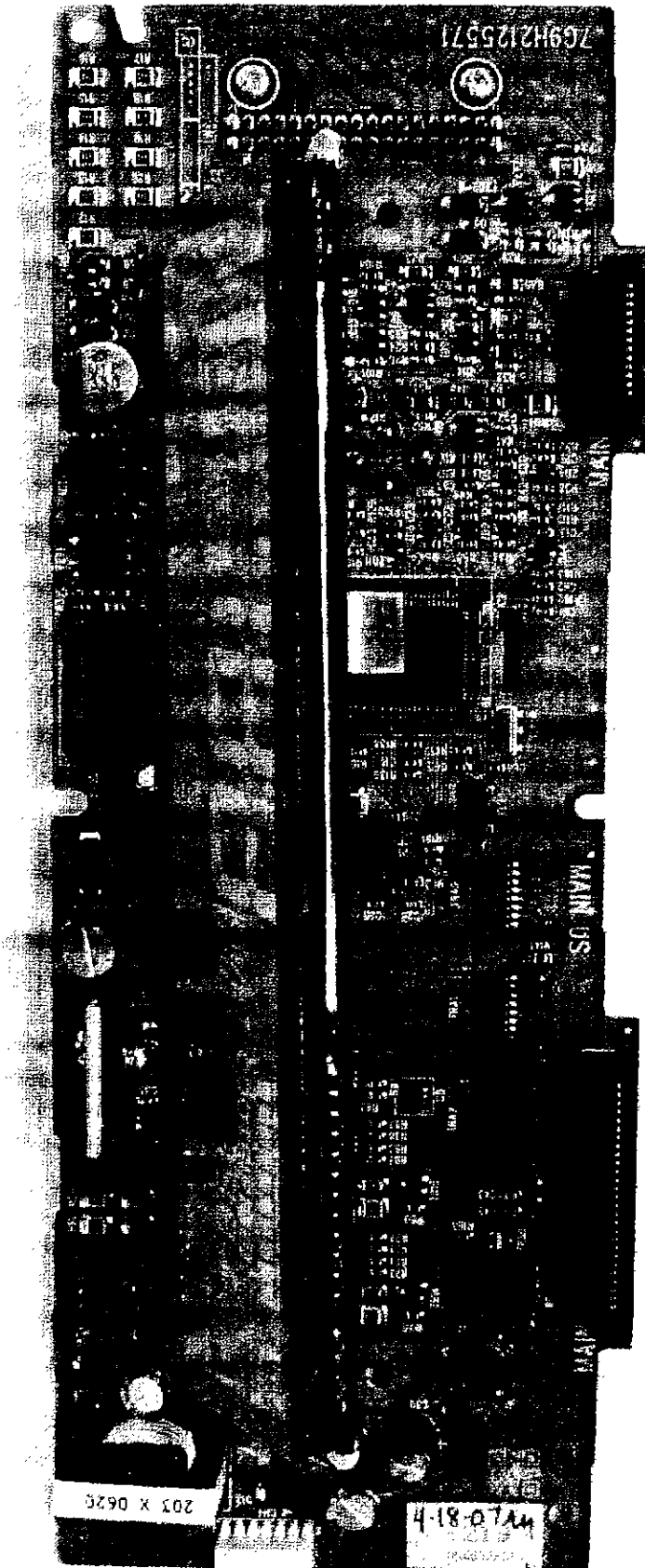
13/3

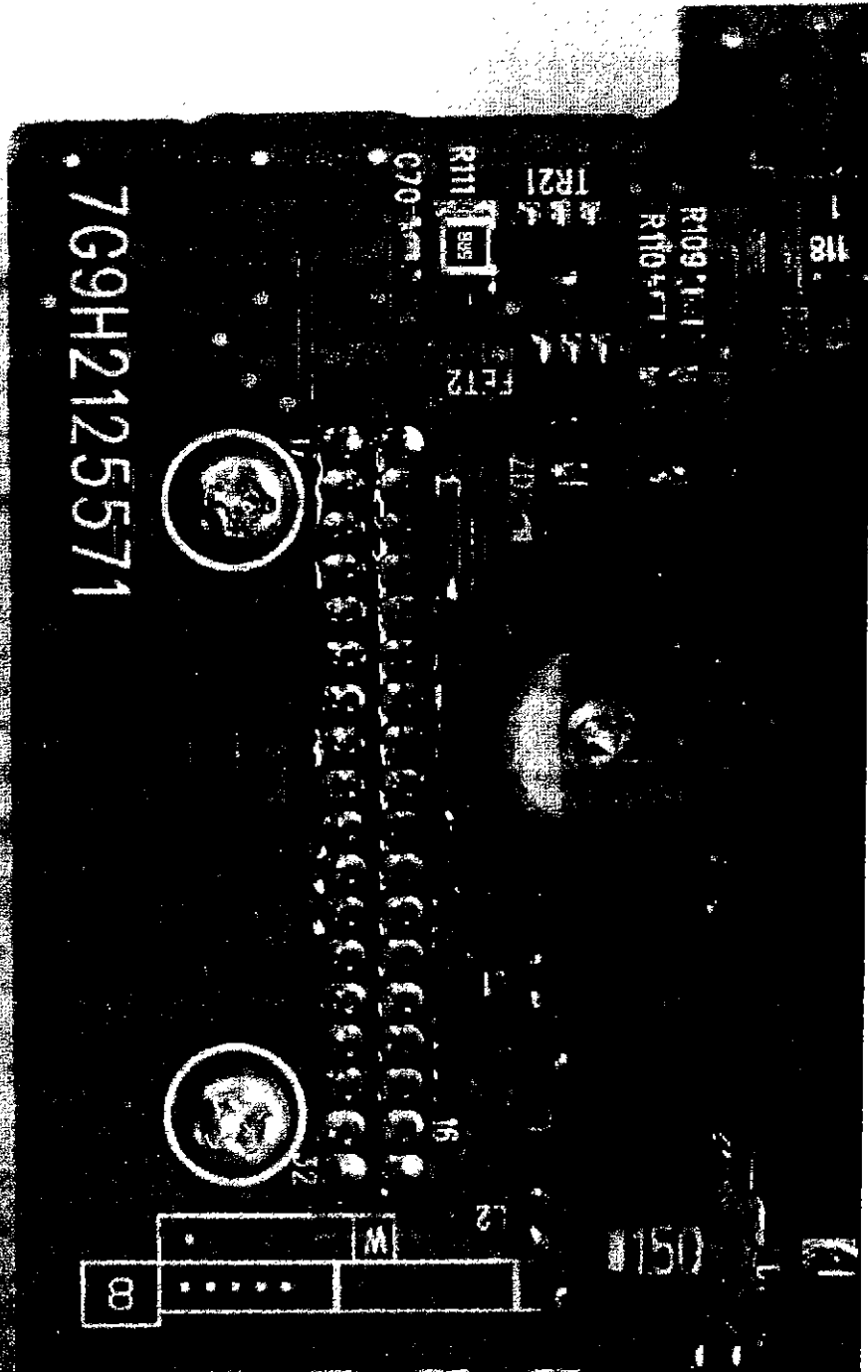


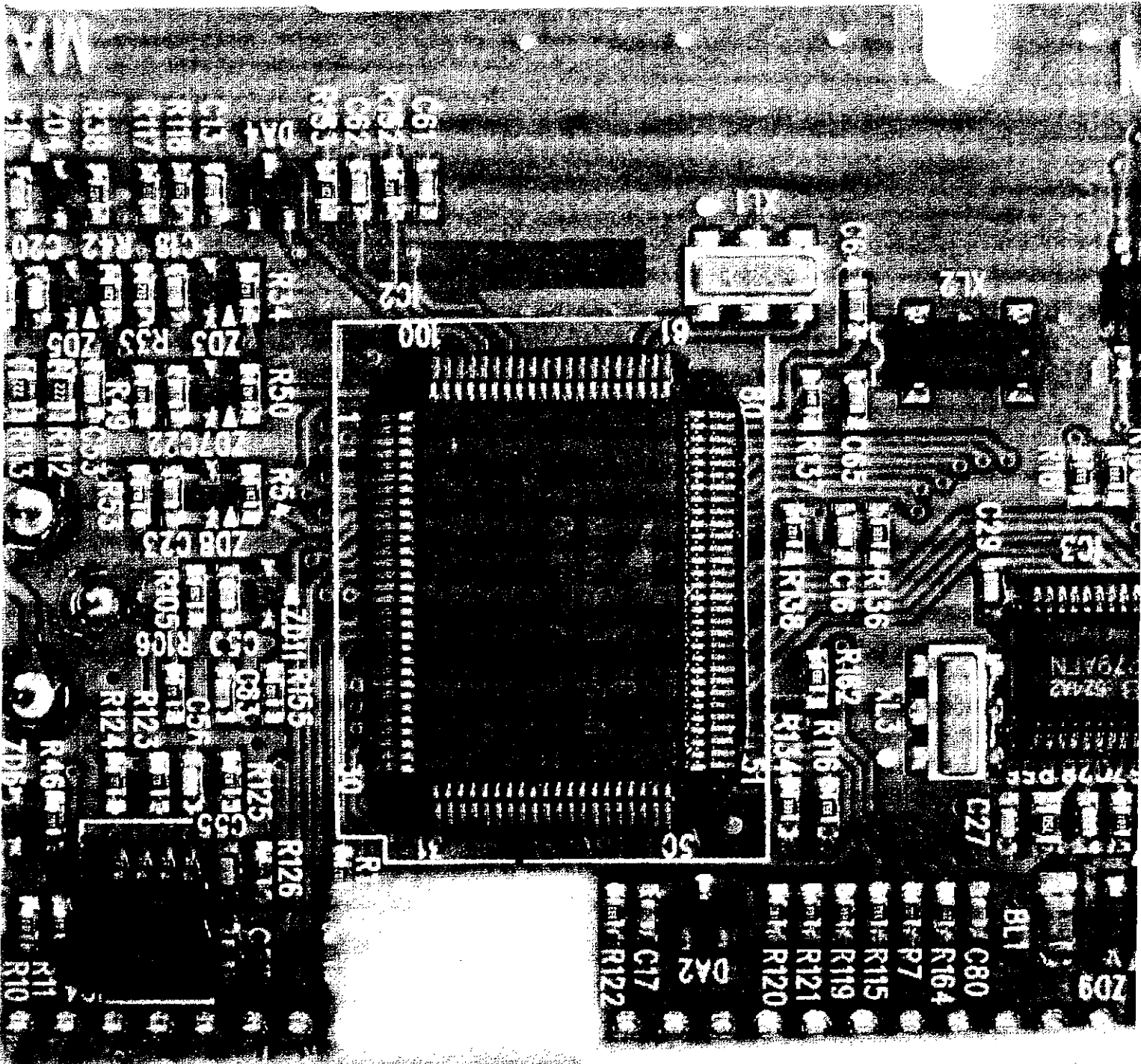












# **EXHIBIT D**

**FUJITSU SEMICONDUCTOR**  
CONTROLLER MANUAL

CM44-10111-2E

# **F<sup>2</sup>MC<sup>TM</sup>-16LX**

## **16-BIT MICROCONTROLLER**

### **MB90580C Series**

# **HARDWARE MANUAL**



## 1.2 Models Available

## 1.2 Models Available

Table 1.2-1 "MB90580C Series Models" lists the available models of the MB90580C series. Functions other than ROM and RAM capacity and clocks are common to all models. The MB90587C/CA does not have the IEBus™ Controller.

## ■ Models Available

Table 1.2-1 MB90580C Series Models

Item	MB90583C	MB90583CA	MB90587C	MB90587CA	MB90F583C	MB90F583CA	MB90V580B
ROM capacity	Mask ROM 128 Kbytes	Mask ROM 128 Kbytes	Mask ROM 64 Kbytes	Mask ROM 64 Kbytes	FLASH ROM 128 Kbytes	FLASH ROM 128 Kbytes	-
RAM capacity	6 Kbytes	6 Kbytes	4 Kbytes	4 Kbytes	6 Kbytes	6 Kbytes	6 Kbytes
Clock	Two clocks system	One clock system	Two clocks system	One clock system	Two clocks system	One clock system	Two clocks system
IEBus™ controller	Available	Available	None	None	Available	Available	Available
Dedicated power supply for emulator*	-	-	-	-	-	-	None

\*: Setting of DIP switch S2 for using the emulation pod MB2145-507. For details, see Section 2.7 "Dedicated Power Pin for Emulator" in the Hardware Manual for MB2145-507.

**Note:**

For the evaluation device, use the MB90V580B. Also, if the one clock system is used, equip X0A and X1A with clocks from the tool side.

# **EXHIBIT E**

FUJITSU SEMICONDUCTOR  
DATA SHEET

DS07-13710-4E

## 16-bit Proprietary Microcontroller

CMOS

## F<sup>2</sup>MC-16LX MB90580C Series

MB90583C/583CA/583C/583CA/587C/587CA/580B

### ■ DESCRIPTION

The MB90580C series is a line of general-purpose, Fujitsu 16-bit microcontrollers designed for process control applications which require high-speed real-time processing, such as consumer products.

While inheriting the AT architecture of the F<sup>2</sup>MC<sup>\*1</sup> family, the instruction set for the F<sup>2</sup>MC-16LX CPU core of the MB90580C series incorporates additional instructions for high-level languages, supports extended addressing modes, and contains enhanced multiplication and division instructions as well as a substantial collection of improved bit manipulation instructions. In addition, the MB90580C has an on-chip 32-bit accumulator which enables processing of long-word data.

The peripheral resources integrated in the MB90580C series include: an 8/10-bit A/D converter, an 8-bit D/A converter, UARTs (SCI) 0 to 4, an 8/16-bit PPG timer, 16-bit I/O timers (16-bit free-run timer, input capture units (ICUs) 0 to 3, output compare units (OCUs) 0 and 1), and an IEBus<sup>™</sup> controller <sup>\*2</sup>.

<sup>\*1</sup>: F<sup>2</sup>MC stands for FUJITSU Flexible Microcontroller, a registered trademark of FUJITSU LIMITED.

<sup>\*2</sup>: IEBus<sup>™</sup> is a trademark of NEC Corporation.

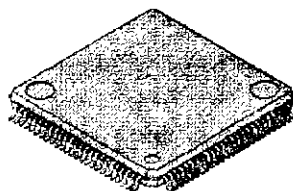
### ■ FEATURES

- Minimum execution time: 62.5 ns/4 MHz oscillation (Uses PLL clock multiplication) maximum multiplier = 4
- Maximum memory space  
16 Mbyte  
Linear/bank access

(Continued)

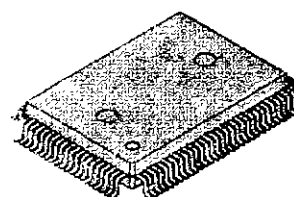
### ■ PACKAGES

100-pin plastic LQFP



(FPT-100P-M05)

100-pin plastic QFP



(FPT-100P-M06)

FUJITSU